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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	Case No. 3:20-cr-00434-HZ
Plaintiff,	**DECLARATION OF COUNSEL IN SUPPORT OF UNOPPOSED MOTION TO CONTINUE TRIAL DATE**
v.	
HUGO BERTEAU-PAVY,	
Defendant	

I, Gerald M. Needham, declare:

1.   I am counsel for Hugo Berteau-Pavy in the above-entitled action.

2.   Mr. Berteau-Pavy has been indicted for one count of Civil Disorder in violation of 18 U.S.C. § 231(a)(3).

3.   Mr. Berteau-Pavy has been released on pretrial conditions and is in compliance with any conditions required of him. He is fully employed.

4.   Mr. Berteau-Pavy has authorized counsel to represent he consents to the continuance with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

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5.   Defense counsel will be filing a motion to dismiss the Indictment this week, which will toll

the speedy trial clock.

6.   Additionally, counsel is in need of more time to conduct legal research, locate potential

exculpatory evidence, review discovery materials with the defendant, and otherwise

properly prepare for trial.

7.   Assistant United States Attorney Tom Ratcliffe has authorized counsel to represent the

government has no objection to the requested continuance.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct; that the statements set forth above are based on my own knowledge,

except where otherwise indicated, and I believe those statements to be true; and that this

declaration was executed on January 26, 2021, in Portland, Oregon.

/s/ Gerald M. Needham
Gerald M. Needham
Attorney for Defendant

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                 DATE